

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

X

VERONICA BROWN,

Docket No.:14-CV-5960 (SLT)(MDG)

Plaintiff,

-against-

MARRIOTT INTERNATIONAL, INC.,

**NOTICE OF MOTION**

Defendant.

X

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 12(b)(6), 12(b)(7), and 19(b), upon the accompanying memorandum of law, the declaration of Daniel M. Stewart and accompanying exhibits, and all prior proceedings and papers filed herein, Defendant MARRIOTT INTERNATIONAL, INC., by its attorney, White, Fleischner & Fino, LLP, will move this Court before the Honorable Sandra L. Townes, United States District Judge, at the United States District Court, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, at a time and date to be set by the Court, for an order dismissing all claims against the Defendant for failure to state a claim on which relief can be granted, and/or dismissing this lawsuit on the basis of *forum non conveniens*, and granting such other relief which to the Court may deem just and proper.

Defendant requests oral argument.

Dated: New York, New York

August 28, 2015

WHITE FLEISCHNER & FINO, LLP

By: \_\_\_\_\_

 Daniel M. Stewart (DMS 7989)

Attorneys for Defendant

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